UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

IN THE MATTER OF:

Huntington Aluminum, Inc. 1605 Riverfork Drive Huntington, Indiana 46750

ATTENTION:

John Wonderly Environmental and Safety Manager

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Huntington Aluminum Inc. (Huntington or You) to submit certain information about the facility at 1605 Riverfork Drive, Huntington, Indiana. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Huntington owns and operates an emission source at the Huntington, Indiana, facility.

We are requesting this information to determine whether your emission source is complying with the Indiana State Implementation Plan and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production at 40 C.F.R. Part 63, Subpart RRR.

Huntington must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Huntington must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Huntington to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Sarah Clark at (312) 886-9733 or clark.sarah@epa.gov.

Date

Edward Nam

Director

Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

- 1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
- 2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
- 3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
- 4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
- 5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
- 6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

- 1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
- 2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

- 3. Provide submission on physical media such as compact disk, flash drive or other similar item.
- 4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number. In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
- 5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
- 6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or National Emission Standards for Secondary Aluminum at 40 C.F.R. Part 63, Subpart RRR.

- 1. "ACGIH Guidelines" refers to the references contained at 40 C.F.R. § 63.14(b)(1), (2), and (3).
- 2. "Bag leak detection system" or "BLDS" means an instrument that is capable of monitoring particulate matter loadings in the exhaust of a fabric filter (i.e., baghouse) in order to detect bag failures. A bag leak detection system includes, but is not limited to, an instrument that operates on triboelectric, light scattering, light transmittance, or other effect to monitor relative particulate matter loadings.
- 3. "Capture and collection system" means the system, including duct systems and fans, and, in some cases, hoods, used to collect a contaminant at or near its source, and for affected sources equipped with an air pollution control device, transport the contaminated air to the air cleaning device.
- 4. "Clean charge" means furnace charge materials, including molten aluminum; T-bar; sow; ingot; billet; pig; alloying elements; aluminum scrap known by the owner or operator to be entirely free of paints, coatings, and lubricants; uncoated/unpainted aluminum chips that have been thermally dried or treated by a centrifugal cleaner; aluminum scrap dried at 343 °C (650 °F) or higher; aluminum scrap delacquered/decoated at 482 °C (900 °F) or higher; and runaround scrap. Anodized aluminum that contains dyes or sealants containing organic compounds is not clean charge.

- 5. The terms "document" and "documents" and "documentation" means any object that records, stores, or presents information, and includes: email; writings; memoranda; contracts; agreements; records; or information of any kind, formal or informal, whether handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy. All documents in hard copy shall also include attachments to or enclosures with any document.
- 6. "FESOP" means the Federally Enforceable State Operating Permit No. F069-33855-00085 issued by IDEM to Huntington on March 26, 2014, and subsequent revisions.
- 7. The term "Huntington" or "you" or "your" includes, but is not limited to: Huntington Aluminum, Inc. or any assumed business names, agents, representatives, employees, contractors, or other entities that performed work or acted in any way on behalf of, are related to, or acted at the direction of Huntington Aluminum, Inc.
- 8. "Tap" means the end of an operating cycle of any individual furnace when processed molten aluminum is poured from that furnace.

Appendix B

Information You Are Required to Submit to EPA

Huntington Aluminum Inc. must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a). All questions refer to the facility located at 1605 Riverfork Drive, Huntington, Indiana (Facility):

- 1. Provide a copy of all permit applications submitted to the Indiana Department of Environmental Management (IDEM) for the Facility from April 1, 2008, to the date of receipt of this request.
- 2. Provide copies of all reports related to CAA compliance submitted to IDEM or EPA from April 1, 2013, to the date of receipt of this request, including semiannual excess emissions/summary reports, FESOP Certifications, FESOP Quarterly reports, FESOP Quarterly Deviation and Compliance Monitoring reports, and FESOP Emergency Occurrence Reports.
- 3. Provide a list of all emissions tests and copies of all associated emissions test reports conducted at the Facility for any reason from April 1, 2013 to the date of receipt of this request. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guidelines for compiling the list and preparing copies of the stack test reports:
 - a. Previous Submissions: You need not provide copies of the three test reports previously submitted to EPA on October 26, 2017. Those tests include: (1) the tests conducted on April 8, 2015, for Baghouse II; (2) tests conducted on May 1, 2015, for Baghouse II; and (3) tests conducted on September 9-10, 2015, for Baghouse I. However, please provide any information that is requested in subparagraphs (b) and (c), below, that you have not already submitted to EPA.
 - b. For each emission test, include the following in a list format: Identify the emissions unit, the date of the test, the federal or state regulation requiring the test (if applicable), the test method(s) used, the physical location of the sample collection points (e.g., before or after emission unit or air pollution control device), and either the feed/charge weight rate or aluminum production weight rate of the associated emission unit, specifying the proportion of clean charge to scrap, if mixed. For each test, indicate whether the emission unit was operating at maximum design capacity, and, where applicable, provide an explanation for why production was limited. For each test, indicate whether the report was shared with IDEM.
 - c. Provide copies of the full stack test reports. For each full stack test report, include the summary pages, the section describing the process and process parameters, lime addition, and flux usage rates at the time of the test, all test runs, and all calculations.
 - d. For each emission test, provide a summary of each set point and/or operating parameter (e.g., pressure drop, lime addition rate, flux injection rate, etc.)

established during the test, including the value(s) of the set point and/or operating parameter with units and identifying materials where applicable (e.g., the type of charge, proportion of clean charge to scrap, flux material, etc.).

- 4. Provide a detailed, up-to-date Facility diagram(s) with the following information identified:
 - a. Air emission units, including each sidewell and hearth;
 - b. Air pollution control equipment;
 - c. Exhaust stacks for each respective piece of air pollution control equipment and for each uncontrolled emission unit (e.g., hearth); and
 - d. Dampers for dilution air.
- 5. From April 1, 2008 to the date of receipt of this request, provide the date of installation for each furnace (RMF #1, RMF #2, and #1 RRMF) and each associated emissions capture and collection system, and list, date, and describe any subsequent modifications to each emissions capture and collection system (e.g., additional ductwork, changes to hood dimensions and/or materials, etc.).
- 6. From April 1, 2008 to the date of receipt of this request, provide all design calculations and efficiency estimates, with an effective date and supporting documentation, related to each original emission capture and collection system, and any subsequent modifications, to assess compliance with and meet the engineering standards for minimum exhaust rates or facial inlet velocities as contained in the ACGIH Guidelines at 40 C.F.R. § 63.1506(c)(1). In addition, for each of the three calculations previously submitted to EPA on October 26, 2017, namely the "Exhaust Requirement Calculations for High Canopy Hood Models" for what are referred to in the report as "#1 Furnace," "#2 Furnace," and "Rotary FCE," provide a justification for all the assumptions and values displayed on page 2 under Step 4, including explanations for the following:
 - a. Why the term " $V_r(A_f-A_c)$ " is ignored;
 - b. Why the actual exhaust "is one half the symmetrical exhaust;"
 - c. What is meant by 'Calc Hood' in the statement, "Total Capture Volume Required using Calc Hood;" and
 - d. How, and at what point in the exhaust route, was the value for 'Measured CFM' determined, citing a performance test if applicable. Specify what percent, if any, of the 'Measured CFM' consisted of damper/dilution air.
- 7. From April 1, 2016, to the date of receipt of this request, provide the following records for the emission capture and collection system and closed vent systems maintained in accordance with 40 C.F.R. § 63.1510(d):
 - a. Copies of all annual inspections reports and flow rate measurements, using EPA Methods 1 and 2, or enclosure verification, using Method 204, of all emission capture, collection, and closed vent systems;

- b. If an alternative to the annual flow rate measurements is used, specify and provide records related to any alternative measurements that are recorded to maintain system operations as required by 40 C.F.R. § 63.1517(b)(14); and
- c. For each measured parameter, state the corresponding operating limit (e.g., average reading of a parametric monitoring instrument), citing the performance test upon which the operating limit is based, and note any deviations and corrective actions.
- 8. Provide a copy of the Facility's Operation, Maintenance, and Monitoring (OM&M) Plan maintained pursuant to 40 C.F.R. § 63.1510(b). Include all previous revisions since April 1, 2013, the corresponding dates for each revision, and a summary of the changes made in each revision.
- 9. Provide copies of all Preventive Maintenance Plans for the Facility, maintained pursuant to the Facility's operating permit. Include all previous revisions since April 1, 2013 and their corresponding dates.
- 10. From April 1, 2013, to the date of receipt of this request, provide documentation for any corrective actions taken to address any instance when process parameters or air pollution control device operating parameters deviated from the value or range established during the performance test and/or incorporated in the OM&M plan.
- 11. Provide the following information for the reverberatory furnaces, identified as RMF #1 and RMF#2 in the FESOP, and the lime-injected fabric filter baghouse that controls emissions from these furnaces, from April 1, 2013, to the date of receipt of this request:
 - a. A description of the operating procedures for each furnace, and whether the units are considered batch processes or continuous processes;
 - b. A description of the baghouse operating procedure, specifying which parameters are monitored, the acceptable range for each parameter, and the actions taken by Huntington if/when those parameters exceed their limits;
 - c. All manufacturer's guidance documents or operating manuals for the baghouse, including, but not limited to, the manufacturer's written specifications and recommendations for operation and maintenance;
 - d. An operating log for each tap, including an explanation of how the molten metal level is determined, and the certification submitted pursuant to 40 C.F.R. § 63.1510(n);
 - e. 3-hour block average inlet temperature for the baghouses;
 - f. Maximum allowed baghouse inlet temperature, the method used to establish the limit (e.g., performance test), and the effective date(s) of these temperatures;
 - g. Recorder response range and monitoring frequency for the baghouse inlet temperature monitoring device;

- h. Time and mass of each baghouse lime addition with an explanation for the basis of the timing used (e.g., length of operating cycle, time period used in a specific performance test, etc.);
- i. Calculations of the average lime addition rate (lb/ton of feed/charge), as required by 40 C.F.R. § 63.1517(b)(4)(iii) for non-continuous lime injection systems (if not available, explain); and
- j. A statement for how each furnace complies with requirements of Subpart RRR during periods of startup and shutdown pursuant to 40 C.F.R. § 63.1513(f).
- 12. Provide the following information for the Rotary Batch Reverberatory Furnace, identified as #1 RRMF in the FESOP, from April 1, 2013, to the date of receipt of this request:
 - a. List every type of feed/charge material, excluding salts, added to the furnace (e.g., chips, sows, dross, etc.);
 - b. Describe each feed/charge material identified above as either clean charge or specify how the material deviates from clean charge (e.g., oily);
 - c. A description of the baghouse operating procedure, specifying which parameters are monitored, the acceptable range for each parameter, and the actions taken by Huntington if/when those parameters exceed their limits;
 - d. All manufacturer's guidance documents or operating manuals for the baghouse, including, but not limited to, the manufacturer's written specifications and recommendations for operation and maintenance;
 - e. 3-hour block average inlet temperature for the fabric filter baghouse, if recorded;
 - f. Maximum allowed fabric filter baghouse inlet temperature, the method used to establish the limit (e.g., performance test), and the effective date(s) of these temperatures; and
 - g. Recorder response range and monitoring frequency for the inlet temperature monitoring device.
- 13. Provide the following information regarding each BLDS in use at the Facility, and as required by Subpart RRR:
 - a. The emission point, air pollution control unit, and process associated with each BLDS;
 - b. The manufacturer's guidance documents, including, but not limited to, the manufacturer's specifications (including the detection limit) and the manufacturer's recommendations for system operation, system maintenance, and establishing alarm set points and delay times;

- c. All operation and maintenance documents developed by Huntington to establish alarm set points and delay times;
- d. The alarm set points and delays utilized by Huntington from the date of the installation of the BLDS to the date of receipt of this letter;
- e. The data used to justify each modification of an alarm set point and/or delay time and a narrative describing why each modification was appropriate;
- f. The percentage of operating time the BLDS was in alarm during each 6-month reporting period from April 1, 2013, to the date of receipt of this request;
- g. The number of total operating hours for each associated emission unit (i.e., RMF #1, RMF #2, #1 RRMF) during each 6-month reporting period from April 1, 2013, to the date of receipt of this request; and
- h. Records of each alarm with the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken from April 1, 2013, to the date of receipt of this request.
- 14. From April 1, 2016, to the date of receipt of this request, provide all records of pressure drop readings for each baghouse controlling the three reverberatory aluminum melting furnaces (i.e., RMF #1, RMF #2, #1 RRMF). For the records previously submitted to EPA on October 26, 2017, provide an explanation for the discrepancies between the values recorded in the file "BAGHOUSE 1 10-25-17.pdf" and the file "August 2017 Baghouse 1 D-P.XLS" for the month of August; specifically, explain why the handwritten values in the pdf, which appear to have been collected several times per day, are greater than those recorded in the electronic spreadsheet, recorded daily.
- 15. Provide an unlocked Excel-compatible spreadsheet containing records of the monthly operating hours and total aluminum processed (in tons) per month for each individual furnace (RMF #1, RMF #2, #1 RRMF) from April 1, 2013, to the date of receipt of this request. Specify whether the aluminum quantities provided represents the feed/charge weight or aluminum production weight. Include a 12-month rolling sum.
- 16. Provide an unlocked **Excel-compatible spreadsheet** containing records of the total aluminum processed (in tons) for each 24-hour day of operation for each individual furnace (RMF #1, RMF #2, #1 RRMF) from April 1, 2016, to the date of receipt of this request. Specify whether the quantities provided represent the feed/charge weight or aluminum production weight.
- 17. Provide the following information for all salts (e.g., flux) added to one or more furnaces, including sidewell and hearth furnaces, at the Facility from April 1, 2013, to the date of receipt of this request:
 - a. Safety Data Sheets (SDS), technical data sheets, and composition for each salt, excluding the SDS for A-614-2 already submitted to EPA on October 26, 2017;

- b. A narrative describing how and when each salt is weighed and added; and
- c. Records of any calibration of the salt weight measurement device.
- 18. Provide an unlocked Excel-compatible spreadsheet containing records of flux usage, in units of pounds, and the flux injection rate, in units of pounds of flux per ton of feed/charge, for each furnace (RMF #1, RMF #2, #1 RRMF) from April 1, 2013 to the date of receipt of this request, as required by 40 C.F.R. § 63.1517(b)(5). Include the date, the time period during which the flux was added, the weight of flux added, and the identity of the flux used. Specify and explain the basis of each time period used (e.g., 15-minute block period, length of operating cycle, or the duration used in a specific performance test).
- 19. Answer the following questions regarding each hearth furnace at the Facility:
 - a. Since April 1, 2013, has Huntington ever added flux and/or feed/charge materials directly to any hearth furnace? For each instance, provide the date, specify the hearth furnace, identify the flux, and describe the feed/charge, specifying whether the feed/charge met the definition of clean charge. Has Huntington conducted any performance tests under these conditions?
 - b. How does Huntington monitor the level and maintain the passage of molten metal between the sidewell and the hearth for each furnace?
- 20. Provide copies of any requests for alternative monitoring methods related to the Subpart RRR submitted to IDEM or the EPA. Also provide copies of any communication with IDEM or the EPA surrounding the submittal and/or response.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

"Emission data" means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

- 1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
- 2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
- 3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
- 4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
- 5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
- 6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

- 7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
- 8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

John Wonderly Huntington Aluminum Inc. 1605 Riverfork Drive Huntington, IN 46750

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by E-mail to:

Phil Perry, Chief Air Compliance and Enforcement Branch PPERRY@idem.IN.gov

On the day of Year 2018.

Kathy Jones, Program Technician

AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 20150640000459656219